

## **Response to environmental agency concerns regarding planning application for Clovelly House School.**

### **FORWORD:**

Please note, Niall Freeman no longer works for the environmental agency and I don't have another officer appointed. I have been advised to contact [Planning.trentside@environmental-agency.gov.uk](mailto:Planning.trentside@environmental-agency.gov.uk)

1. We are not looking for change of use. The property already has planning permission for the school granted in 2017 which has been running since 2017.
2. One of the nine school timber buildings already has planning permission.
3. There are an additional two buildings alongside this one, which passed flood regulations in 2017.
4. Five of the timber cabins are alongside the stream and these are potentially affected by floods. However, they are all raised on timber struts and water is not impeded as it can flow beneath the cabins.
5. We have a comprehensive risk assessment and contingency plan for the school. (See attached, appendix 1.)
6. An additional cabin is not on the bank of the stream and is on stilts, about 75cms about ground level. This is not affected by flooding. This is intended to look like a gypsy caravan.
7. Nobody sleeps on the property in the school buildings.
8. The cabins are constructed from wood and have a life span of about twenty-five years. The school has already been running since 2017, so the life span of the cabins is now about eighteen years. The school is not planning to replace these buildings on the banks of the stream.
9. The school is OFSTED registered for up to ten pupils. There are no plans to apply to increase this number.
10. In view of the recent floods, the school has an action plan to move some of the buildings out of the flood zone, to higher ground. (See attached, appendix 2)
11. This school is for hard-to-place children who are thriving here. If these children loose their school it will be devastating for them.
12. The children that attend this school have very high needs and most of the children have their own personalised cabins.

Jennifer Collighan

## **APPENDIX 1 – Flood Risk Assessment**

|                         |                                |             |             |               |                                                    |
|-------------------------|--------------------------------|-------------|-------------|---------------|----------------------------------------------------|
| Brythan House           | Clovelly House School          | Assessor(s) | J.COLLIGHAN | Date:         | January 2024                                       |
|                         |                                |             |             | Review Date:  | Annually, unless circumstances or guidance changes |
| Assessment of risk for: | Clovelly House garden flooding |             |             | Reference No: | Ver 03                                             |

| HAZARD/<br>RISK                                        | THOSE<br>AT RISK                                                              | POTENTIAL<br>OUTCOME | WHAT IS THE RISK, WHAT ARE THE<br>CONTROLS, IS FURTHER ACTION<br>REQUIRED?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | RISK RATING |       |        | ADDITIONAL<br>MANAGEMENT PLAN                                                          | ACTION REQ  |             | Date<br>Completed |
|--------------------------------------------------------|-------------------------------------------------------------------------------|----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|-------|--------|----------------------------------------------------------------------------------------|-------------|-------------|-------------------|
|                                                        |                                                                               |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |             |       |        |                                                                                        | By<br>whom? | By<br>when? |                   |
| <i>List hazards<br/>here.</i>                          | <i>List groups<br/>of people at<br/>risk from<br/>hazards<br/>identified.</i> |                      | <i>List existing risks and controls here or<br/>note where information can be found.<br/>If needed, list further actions proposed<br/>where it is reasonably practicable to do<br/>more.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Likelihood  | Score | Rating | <i>List the actions proposed<br/>where it is reasonably<br/>practicable to do more</i> |             |             |                   |
| <b>Risk of<br/>flooding<br/>during heavy<br/>rains</b> | Adults,<br>children,<br>visitors,<br>contractors                              | 6                    | <b>RISKS:</b><br>- The stream may flood its banks<br>- flood water from the south side may rise up in the garden<br>- water may run down the garden from the north side<br>- children and staff may become anxious<br>- flood water may enter buildings and cause damage<br>- flood water may go across the public road and may disrupt traffic and access to school<br><b>CONTROLS:</b><br>- To make all staff and children aware if there is a risk of flooding<br>- for all to use the boardwalk to stay out of the water and access classrooms<br>- to make alternative plans to move staff and children if necessary<br>- to build up the bank around the stream to minimize flooding<br>- to inform taxis if flooding occurs<br>- No-one sleeps in the cabin overnight<br>- Cabins are used during school times only<br>- Flood water rushes down the stream, but not in the grounds.<br>- Children taught to stay away from the stream bank in flooding<br>Flood water in the grounds rises and falls gradually – gives warning of potential flooding | 5           | 30    | Medium |                                                                                        | All staff   | Ongoing     |                   |
| <b>Risk of damage<br/>to buildings</b>                 | Adults,<br>young<br>people                                                    | 6                    | <b>RISKS:</b><br>- flood water enters the buildings and causes damage<br>- flood water damages the buildings<br>- buildings become inaccessible during floods<br><b>CONTROLS:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 3           | 30    | Medium |                                                                                        | All staff   | Ongoing     |                   |

|                                                       |                                            |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |   |    |        |                                                                                                                                                                         |                                                            |                                         |  |
|-------------------------------------------------------|--------------------------------------------|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|-----------------------------------------|--|
|                                                       |                                            |    | <ul style="list-style-type: none"> <li>- Buildings in flood zones are temporary timber cabins – plans are in place to re-site cabins in future</li> <li>- Buildings are raised off the ground and are connected by a raised board-walk</li> <li>- Important documents and resources are stored in upper shelves and drawers to prevent possible flood damage</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |   |    |        |                                                                                                                                                                         |                                                            |                                         |  |
| Risk of <b>anxiety among staff and children</b>       | Young people, staff, contractors, visitors | 6  | <p>RISKS:</p> <ul style="list-style-type: none"> <li>- Pupils are anxious about flood conditions which impacts on their ability to function</li> <li>- Staff are anxious about flooding which spreads to children</li> <li>- Education is disrupted due to anxieties around flooding</li> <li>- Children's anxieties are raised as they can't access school due to disruption on the roads</li> </ul> <p>CONTROLS:</p> <ul style="list-style-type: none"> <li>- Look at weather conditions beforehand to facilitate planning</li> <li>- prepare staff and children in advance if flooding is expected</li> <li>- have robust plans in place for alternative education or trips out in the event of flooding</li> <li>- close the school for the day in the event of flooding</li> <li>- have a practice evacuation run if flooding is expected</li> <li>- keep parents and families informed</li> </ul> | 5 | 30 | Medium |                                                                                                                                                                         | Staff- all to be aware and to keep children on supervision | Ongoing, especially during rainy season |  |
| Risk of <b>harm from the stream/ground s Flooding</b> | Young person, staff, visitors              | 10 | <p>RISKS:</p> <ul style="list-style-type: none"> <li>- people are hampered in their movement around the grounds during floods</li> <li>- someone falls into the stream during flooding and loses footing, gets swept downstream</li> <li>- Children fall in the flood water and get wet</li> </ul> <p>CONTROLS:</p> <ul style="list-style-type: none"> <li>- To ensure children and staff are aware of the risks when the stream is in flood</li> <li>- To prepare lower sited classrooms for flood in advance</li> <li>- To encourage children and staff to remain on higher ground when the garden is flooded</li> <li>- to teach children about acceptable risk during floods</li> <li>- To have spare clothes for children who get wet during floods</li> </ul>                                                                                                                                     | 3 | 30 | Medium | <p>STAFF:</p> <p>To teach children about the realities of flood and flood management</p> <p>To have a contingency plan for moving round the grounds during flooding</p> | All staff to be vigilant and monitor weather conditions    | Ongoing                                 |  |
| Risk of <b>harm from Stream</b>                       | Adults, young                              | 7  | <p>RISKS:</p> <ul style="list-style-type: none"> <li>- to be aware of the risk of stagnant</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 3 | 21 | Medium | STAFF:<br>Staff to supervise children at                                                                                                                                | All staff to teach                                         | Ongoing                                 |  |

|           |                                     |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |  |  |  |                        |                                         |  |  |
|-----------|-------------------------------------|--|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|------------------------|-----------------------------------------|--|--|
| and ditch | people,<br>visitors,<br>contractors |  | water in the ditch<br>- to be aware of trip hazards when children are working/playing in the stream<br>CONTROLS:<br>- to educate children about the dangers of streams and ditches<br>- to educate children to respect, yet enjoy the features of the stream and ditch<br>- to be wary of the dangers of the stream and rushing water after floods<br>- staff members to supervise children when playing in or working around the stream<br>- staff to take weather conditions into account around planning activities involving the stream |  |  |  | all times when outside | respect<br>for the<br>water<br>features |  |  |
|-----------|-------------------------------------|--|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|------------------------|-----------------------------------------|--|--|

| Potential Outcome (Severity) |               |                  |              |           | Likelihood given precautions in place |             |        |          |        | Risk Rating Table |         |          |
|------------------------------|---------------|------------------|--------------|-----------|---------------------------------------|-------------|--------|----------|--------|-------------------|---------|----------|
| 10                           | 8             | 5                | 3            | 1         | 10                                    | 8           | 5      | 2        | 1      | Low               | Medium  | High     |
| Fatality                     | Severe injury | Lost time injury | Minor injury | No injury | Certain / imminent                    | Very likely | Likely | Unlikely | Remote | 1 - 19            | 20 - 49 | 50 - 100 |

Comments (include description of task/activity/process/machine being assessed.)

This risk assessment will be reviewed termly. If necessary it will be reviewed following an incident or display of new behaviour.

| Assessors - Name   | Assessors - Signature     | Date    | Review date | Reason for Review |
|--------------------|---------------------------|---------|-------------|-------------------|
| Jennifer Collighan | <i>Jennifer Collighan</i> | 25.1.24 |             |                   |
|                    |                           |         |             |                   |
|                    |                           |         |             |                   |
|                    |                           |         |             |                   |

## APPENDIX 2, Clovelly House School Flood Action Plan, 2024

For the action plan to be put in place over the duration of 2024, to reduce the impact of flooding next winter, (2024/2025).

### 1. Action Plan

| Objectives            | Procedures/Process         | Action by: | Time Deadlines | Success Indicator          | Monitored by: | Resources needed | Training needed | Completion date |
|-----------------------|----------------------------|------------|----------------|----------------------------|---------------|------------------|-----------------|-----------------|
| 1. To secure planning | * To write the application | Jennifer   | By Mid-        | The application is written | Sullivan      | Time to          | -               |                 |

|                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                            |                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                    |                                                                                          |   |  |
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| permission to <b>move existing cabins</b> on site.                                   | <ul style="list-style-type: none"> <li>* To provide sketches to illustrate the plan</li> <li>* To submit the plan within time scales for the planning application</li> <li>* To adjust until plans are approved</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                              | Collighan                  | February 2024          | Sketches of the grounds with revisions are included<br>The plan reaches the planning office within time frames<br>Plans are approved.                                                                                                                                                                                                                                                                                                                         | Archer             | measure site<br>Time to write the plan                                                   |   |  |
| <b>2. To improve access to the boardwalk by extending the ramp</b> on the north side | <ul style="list-style-type: none"> <li>* To raise the existing ramp onto the boardwalk.</li> <li>* To extend the ramp so that access onto the boardwalk is unimpeded during flooding</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                         | Barry Armson (maintenance) | By end February 2024   | <ul style="list-style-type: none"> <li>* The existing ramp onto the boardwalk is raised.</li> <li>* The ramp is extended so that access is unimpeded during flooding</li> </ul>                                                                                                                                                                                                                                                                               | Jennifer Collighan | Time to raise the ramp<br>Materials to extend the ramp                                   | - |  |
| <b>3. To prepare the new site</b> for replacement of the cabins                      | <ul style="list-style-type: none"> <li>* The plan is to move three cabins to the site of the current 'poly tunnel'</li> <li>* The site chosen historically had a building on (see 'Buy a Plan attached) and is indicated as a building</li> <li>* The site is on higher ground, outside of the designated red flood zone (See Aegaea Flood Risk Assessment)</li> <li>* To clear the site ready for the concrete base</li> <li>* To concrete the base of the site ready for re-siting of the cabins</li> <li>* To construct the concrete base during school holidays so as not to disrupt children's learning</li> </ul> | Barry Armson               | By Mid-April, 2024     | The base of the site is cleared<br>The base of the site has been concreted and is ready for re-siting of the cabins<br>The concrete base is constructed during school holidays so as not to disrupt children's learning                                                                                                                                                                                                                                       | Jennifer Collighan | Cost of labour to build the site, cost of building materials to concrete the site        | - |  |
| <b>4. To move the office cabin,</b> to the new site                                  | <ul style="list-style-type: none"> <li>* To prepare the children for changes that will take place during the school holidays</li> <li>* To move the cabin which is currently used as an office to the new site.</li> <li>* To dismantle the cabin and rebuild it on the new site</li> <li>* To have an electrician to disconnect the electricity from the old site and to reconnect it at the new site.</li> <li>* To move all the fixtures and fittings and furniture to the newly sited cabin.</li> </ul>                                                                                                             | Barry Armson               | By Mid-August 2024     | <ul style="list-style-type: none"> <li>* Children are aware of impending changes</li> <li>* The cabin which is currently used as an office has been moved to the new site.</li> <li>* The cabin has been dismantled and rebuilt on the new site</li> <li>* The electricity has been disconnected from the old site and reconnected at the new site.</li> <li>* All the fixtures and fittings and furniture has been moved to the newly sited cabin</li> </ul> | Jennifer Collighan | Cost of labour to dismantle and rebuild the cabin on the new site<br>Cost of electrician | - |  |
| <b>5. To move the cabin closest to the stream</b> to the new site                    | <ul style="list-style-type: none"> <li>* To prepare children for changes that will take place over the school holidays</li> <li>* To move the cabin which is currently used as a classroom to the new site.</li> <li>* To dismantle the cabin and rebuild it on the new site</li> <li>* To have an electrician to disconnect the electricity from the old site and to</li> </ul>                                                                                                                                                                                                                                        | Barry Armson               | By End of October 2024 | <ul style="list-style-type: none"> <li>* Children are aware of impending changes</li> <li>* The cabin which is currently used as a classroom has been moved to the new site.</li> <li>* The cabin has been dismantled and rebuilt on the new site</li> </ul>                                                                                                                                                                                                  | Jennifer Collighan | Cost of labour to dismantle and rebuild the cabin on the new site<br>Cost of electrician | - |  |

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|                                                                 | reconnect it at the new site.<br>* To move all the fixtures and fittings and furniture to the newly sited cabin.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |              |                         | * The electricity has been disconnected from the old site and reconnected at the new site.<br>* All the fixtures and fittings and furniture has been moved to the newly sited cabin                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                    |                                                                                                                                                                        |   |  |
| 6. To <b>move the cabin closest to the pond</b> to the new site | * To prepare children for changes that will take place over the school holidays<br>* To move the cabin which is currently used as a classroom to the new site.<br>* To dismantle the cabin and rebuild it on the new site<br>* To have an electrician to disconnect the electricity from the old site and to reconnect it at the new site.<br>* To move all the fixtures and fittings and furniture to the newly sited cabin.                                                                                                                                                                                                                               | Barry Armson | By End of December 2024 | * Children are aware of impending changes<br>* The cabin which is currently used as a classroom has been moved to the new site.<br>* The cabin has been dismantled and rebuilt on the new site<br>* The electricity has been disconnected from the old site and reconnected at the new site.<br>* All the fixtures and fittings and furniture has been moved to the newly sited cabin                                                                                                                                                                                                                                                         | Jennifer Collighan | Cost of labour to dismantle and rebuild the cabin on the new site<br>Cost of electrician                                                                               | - |  |
| 7 To <b>convert the garage to office space</b> for the school.  | * For the shed to remain alongside the stream on the base which was originally the outside toilet for the home<br>* To clear out the garage and move equipment to the shed alongside the stream<br>* To ensure that the lower shelves of the shed contain non-perishable items such as boats & garden equipment in case of 100yr flood<br>* To store other items higher up the shelves.<br>* To convert the brick-built garage to use as office space<br>* To replace the garage door and side door with UPVC glass doors<br>* To put a ceiling in the garage<br>* To re-floor the garage<br>* To move the office equipment into the newly converted garage | Barry Armson | By end of August 2024   | * The shed to remain alongside the stream on the base which was originally the outside toilet for the home<br>* The garage has been cleared and equipment moved to the shed alongside the stream<br>* The lower shelves of the shed contain non-perishable items such as boats & garden equipment in case of 100yr flood<br>* Other items are stored higher up the shelves.<br>* The brick-built garage is converted to use as office space<br>* The garage door and side door are replaced with UPVC glass doors<br>* A ceiling is fitted in the garage<br>* The garage is refloored<br>* Office equipment is moved into the newly converted | Jennifer Collighan | Cost of labour to move items stored in the garage to the shed<br>Cost of labour to put a ceiling in the garage<br>Cost of contractors fitting UPVC doors to the garage | - |  |

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|                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                    |                       | garage                                                                                                                                                                                                                                                                    |                    |                                             |   |  |
| 8. To <b>improve access to the cabin raised on stilts</b>              | <ul style="list-style-type: none"> <li>* The cabin is raised on stilts 75cms off the ground and looks like a gypsy caravan</li> <li>* The cabin to remain for the duration of its lifetime – as it is further from the bank than the other cabins.</li> <li>* To build a second set of steps to the north side of the entrance to facilitate easier access in the event of flooding</li> </ul>                                                                                                                 | Barry Armson                       | By End November 2024  | * A second set of steps is built to the north side of the entrance to facilitate easier access in the event of flooding                                                                                                                                                   | Jennifer Collighan | Time to build steps                         |   |  |
| 9. To <b>tighten flood preparations for the recreation room.</b>       | <ul style="list-style-type: none"> <li>* For the recreation room (summer house) to remain alongside the stream for the duration of the life of the cabin, but not to be replaced.</li> <li>* For perishable items to be placed higher up on shelves in the room</li> <li>* For the recreation room not to be used during severe flooding</li> <li>* For children to use the recreation room for games, gatherings, etc.</li> <li>* For the flood contingency plan to be implemented when necessary.</li> </ul> | All staff                          | With immediate effect | <p>Perishable items are placed higher up on shelves in the room</p> <p>The recreation room is not used during severe flooding</p> <p>Children to use the recreation room for games, gatherings, etc.</p> <p>The flood contingency plan is implemented when necessary.</p> | Jennifer Collighan | -                                           | - |  |
| 10. To <b>make the site good and attractive</b> as buildings are moved | <ul style="list-style-type: none"> <li>* To ensure that all building materials are removed after moving each cabin</li> <li>* To ensure that the old sites of cabins is landscaped and attractive</li> <li>* To continue to make the grounds safe and pleasant for children</li> </ul>                                                                                                                                                                                                                         | Jennifer Collighan<br>Barry Armson | Ongoing               | <ul style="list-style-type: none"> <li>* All building materials are removed after moving each cabin</li> <li>* Old sites of cabins are landscaped and attractive</li> <li>* The school continues to make the grounds safe and pleasant for children</li> </ul>            | Jennifer Collighan | Cost of plants and features for landscaping | - |  |
|                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                    |                       |                                                                                                                                                                                                                                                                           |                    |                                             |   |  |

Jennifer Collighan